

## REMARKS

Claims 24-46 were pending and presented for examination and in this application. In an Office Action dated October 18, 2007, claims 24-46 were rejected. Applicants thank the Examiner for examination of the claims pending in this application and addresses the Examiner's comments below. Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections, and withdraw them.

### Response to Rejection Under 35 USC 103(a)

In the Office Action, Examiner rejects claims 24-46 under 35 USC § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,398,336 ("Tantry") in view of U.S. Patent No. 6,673,499 ("Friedman"). This rejection now is traversed.

Claim 24 now recites:

A system in a supply chain network, the system comprising:  
one or more site data appliances comprising one or more types of data source equipment, the one or more site data appliances configured to use a protocol to **collect specification information**, including event information, from the one or more types of data source equipment, **the specification information forming a Description Document**;  
one or more site servers coupled to one or more site data appliances configured to **gather the specification information forming the Description Document** from the one or more site data appliances; and  
a data center coupled to the one or more site servers configured **to automatically generate a mapping table based on the Description Document, which maps the event information, of the one or more site data appliances, to event handlers for execution in response to an event.**

As an initial matter, Applicants note that the Examiner suggested in the Final Office Action dated April 17, 2007 (p. 5), that “introduc[ing] the Description Document in the independent claim and link[ing] it to the generation of the mapping table” would overcome the similar rejection of the claims in that action.

These aspects of the claimed invention are not disclosed by Tantry or Friedman, alone or in the combination suggested by the Examiner. Specifically, neither Tantry nor Friedman, alone or in combination show at least “one or more site data appliances ...collect[ing] specification information...[to] form[ ] a Description Document,” “one or more site servers ...gather[ing] the specification information forming the Description Document,” nor “a data center ...automatically generat[ing] a mapping table based on the Description Document, which maps the event information, of the one or more site data appliances, to event handlers for execution in response to an event.”

The Examiner apparently believes either the Application Engines or the widget library of Tantry to be equivalent to the Description Document, although it is unclear from the rejection which (Office Action 10/18/07 at p. 2, “Application Engines bridge the user interface widget library (descriptions documents) with the factory services/factory object library.”). Neither Tantry’s Application Engines nor widget library can correctly be characterized as equivalent to a Description Document. The Description Document as claimed comprises “specification information, including event information, from the one or more types of data source equipment,” and “which maps the event information, of the one or more site data appliances, to event handlers for execution in response to an event.” By contrast, Tantry’s Application Engines are “part of the user interface,” “form the primary interaction with the end user,” and “are the background processes that process the user

interaction further.” Col. 10, ll. 27-28, 44-46, 59-60. Also in contrast to a Description Document as claimed, Tantry’s widget library is not specifically defined by Tantry, but is understood to be “a record ... of what machine worked on the widgets, at what point, what was the state of the environment during that work, what were the work instructions followed.” Col. 7, ll. 10-13. Thus, neither show a Description Document as claimed. Importantly, in either case, the Examiner provides no discussion of where the references disclosing forming or creating a Description Document as claimed.

Friedman does not remedy this deficiency, nor does the Examiner assert that it does. Friedman is cited for “automatically generating a mapping table.” Office Action 10/18/07 at p. 2-3. The Examiner admits that Tantry does not disclose this element. *Id.* Specifically, the Examiner points to Friedman at Abstract, ll. 13-17 for this aspect. This claim element recites: “automatically generat[ing] a mapping table **based on the Description Document**, which maps the **event information, of the one or more site data appliances, to event handlers for execution in response to an event.**” In contrast, the portion of Friedman cited by the Examiner discloses: “This structure creates a hierarchical organization that is used for mapping a particular encountered namespace specification into a unique value that represents both the namespace specification and an element tag in which the namespace specification occurs.” Friedman, Abstract, ll. 13-17. Friedman defines namespace and namespace specification, respectively, as follows: “The dictionary of element names defined by a schema is referred to as a “namespace.”” “A namespace specification within an XML document is said to have a “scope” which includes all child nodes beneath the namespace specification.” Friedman, col. 1, ll. 39-40; col. 2, ll. 12-14. Nowhere does Friedman mention

a mapping of **event information, of the one or more site data appliances, to event handlers for execution in response to an event.**

Thus, these aspects of the claimed invention are not disclosed or suggested by Tantry or Friedman, considered alone or in the combination proposed by the Examiner.

Thus, the deficient disclosures of these references, fail to establish even a *prima facie* basis from which a proper determination of obviousness under 35 U.S.C. § 103(a) can be made. Applicants submit that claim 1 is patentably distinguishable over the cited references.

Independent claims 24, 31, 38, and 39, as amended, recite similar limitations and thus are patentably distinguishable over the cited references for at least the above reasons. Claim 46 was left unamended, however, claim 46 recites “**generat[ing] a description document** comprising the specification information” and “automatically generat[ing] a mapping table, **which maps the event information, of the one or more site data appliances, to event handlers in the description document** for execution in response to an event, wherein the one or more site servers execute events **in accordance with the description document.**” Thus, Applicants submit that claim 46 also is patentably distinguishable over the cited references for the above-stated reasons.

Claims 25-30, 32-37, and 40-45 variously depend from claims 24, 31, and 39, which were shown above to be patentable over the cited references and which recite additional patentably distinguishable features not shown in the cited references. For these reasons, Applicants submit that claims 25-30, 32-37, and 40-45 also are patentably distinguishable over the cited references.

### **Conclusion**

In sum, Applicants respectfully submit that claims 24-46 as presented herein, are patentably distinguishable over the cited references and in condition for allowance. Therefore, Applicants request reconsideration of the basis for the rejections to these claims and request allowance of them.

In addition, Applicants respectfully invite the Examiner to contact Applicants' representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

Respectfully Submitted,

Date: January 14, 2008

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